REMARKS

Amended Claims

Claims 1, 8 and 15 are amended herein.

Claim Rejections Under 35 U.S.C. § 103

Claims 1-3, 5-10, and 12-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Mizutani (U.S. Patent No. 6,078,400) in view of Takeda et al. (U.S. Patent No. 5,845,057). Applicant respectfully traverses this rejection and submits that claims 1-3, 5-10, and 12-20 are allowable for the following reasons.

In regards to Mizutani, the Examiner stated that "Mizutani discloses an imaging device comprising: a processor adapted to compile error information when an error is detected, wherein the error is based on one or more imaging device processes . . . and a storage device coupled to the processor, wherein the processor is adapted to store the error information for one or more of transmission, retrieval, and disposal of the error information based on user criteria (image data storing device stores image data as error information, which is sent by error information sending device to client apparatuses (column 7, lines 32-37))." (Office Action mailed March 23, 2006, Page 2).

Applicant respectfully disagrees with the Examiner and maintains that Mizutani does not compile error information as recited in the Applicant's claims, as admitted by the Examiner on Page 4 of the Office Action mailed March 23, 2006 ("Mizutani does not disclose error information comprising user error information and administrator error information, including the location where the error occurred, the type of error detected, and one or more of the program address where the error occurred, sequence of events that lead up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace. . ."). In addition, Applicant maintains that Mizutani does not store more than one partially generated image at a time and thus does not compile or store error information on two or more error occurrences. Error information is only defined in Mizutani as the partially rendered image at the point the error occurred (*See*, Mizutani Figures 1, 3A and 4; Column 1, Lines 39-59; Column 2, Lines 12-35, 46-66; Column 7, Lines 28-37, 59-67; and Column 8, Line

16 to Column 10, Line 3) Applicant has carefully reviewed Mizutani and has not found error information defined in any way other than as the partially rendered image that resulted from the error. Further, Applicant also respectfully maintains that Mizutani does not save or store error information in response to an error, but only takes the existing partially generated image data (the bitmap) resident in the printer memory from the errored print job to send to the user. Applicant additionally maintains that Mizutani only has one (not two or more) partially generated image in its memory at a time and thus, even if it does store error information, it does not store error information for two or more error occurrences. *See*, Mizutani, Figures 1, 3A, 4 and 5A-5C; Column 5, lines 34-47; Column 6, line 52 to Column 7, line 22; Column 7, line 28-67; and Column 8, lines 4-65.

Applicant therefore respectfully maintains that Mizutani does not teach or disclose an imaging device that is adapted to compile the error information when an error is detected and store in a storage device the error information for two or more errors, wherein the error information includes two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace.

In regards to Takeda et al., the Examiner stated that "Takeda discloses a print processing method for a plurality of printing apparatuses connected to a network, wherein a report sheet image is generated, showing, in addition to a name of a substitute printing apparatus, a current state of the apparatus having an error, measures to remove the error, etc. (read Abstract). The report sheet image displays user and administrator error information (column 9, line 32- column 10, line 53; Figs. 8-11). The error information disclosed in Mizutani comprising image data recorded when the error occurred, and does not inform a user of the type of error that has taken place. By providing a report sheet as disclosed in Takeda, a user can easily determine when an error occurred, and thus how to remedy the situation. Therefore, it would have been obvious for one of ordinary skill in the art to modify the teaching of Mizutani by providing a printout of user and administrator error information, as disclosed in Takeda." (Office Action mailed March 23, 2006, Page 4).

Applicant respectfully disagrees and maintains that there is no motivation or suggestion to modify the references, Mizutani and Takeda et al., in this manner. Specifically, Applicant contends that to modify Mizutani to compile error information when an error is detected and store in a storage device the error information for two or more errors, wherein the error information includes two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace would require a modification of Takeda et al.'s printing apparatus to compile error information on two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace and allow for the storage of two or more error occurrences. Takeda et al. expressly teaches away from this by printing a report sheet for each error, not storing the error, and only printing the error code/remedial action required and the substitute print destination. *See, e.g.*, Takeda et al., Column 2, Lines 29-65, Figures 2, 8-11, 20-26; Column 5, Line 49 to Column 6, Line 40; Column 9, Line 32 to Column 6, Line 54; and Column 16, Line 45 to Column 21, Line 14. Applicant also finds no motivation or suggestion to modify the operation of the image device of Mizutani in this manner expressly or impliedly contained in the Takeda et al. reference, and the Office Action does not provide a convincing line of reasoning as to why an artisan would have found the claimed invention to have been obvious in light of the teachings of the reference. Applicant thus submits that the Office has failed to meet its burden of establishing a *prima facie* case of obviousness. *See* MPEP § 706.02(j) ("The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. 'To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references.'").

Applicant respectfully maintains that Takeda et al. discloses a networked printing system of terminals and printers having an error processing system that operates when an error occurs to handle the error and/or reroute the print job by reference to look up tables. Specifically, Applicant maintains, that Takeda et al. contains a document managing table (i.e., a print job queue with job execution state; Takeda et al. Figure 12; and Column 10, Line 54 to Column 11, Line 46.), an error detecting table (i.e., a table of error and caution state threshold levels and their associated codes); Takeda et al. Figure 13 and Column 11, Line 47 to Column 12, Line 36.), and an error processing determining table (i.e., a table of actions for the device to take on the occurrence of a selected error code; Takeda et al. Figure 14 and Column 12, Lines 37-67.). The tables of the imaging device of Takeda et al. allow job tracking and allow re-routing of print jobs to other printers on the network. In addition, the image device of Takeda et al. prints an error report message to the user if an error has occurred, as detailed above. *See*, Takeda et al., Figures 20-26; Abstract; Summary; and Column 6, lines 14-40.

If, alternatively, the Examiner is maintaining that either Mizutani or Takeda et al. inherently disclose storage of error information for two or more errors or that the error information includes two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace, Applicant herein traverses this assertion. The Applicant can find no mention of these features in Mizutani or Takeda et al. to support the Examiner's assertion and respectfully requests that a secondary reference or reasoned statement be provided to support the Examiner's assertion. Applicant respectfully maintains that, as detailed above, one skilled in the art would not view the Mizutani or Takeda et al. as disclosing such an imaging device, either expressly or inherently. Applicant respectfully submits that if the Examiner maintains that this is an inherent feature, the Examiner has the burden of proving that the inherent element must of necessity only work in the manner of the Applicant's claimed invention. If any other interpretation is possible for the inherent element relied upon for the rejection, the rejection cannot be maintained.

Applicant thus respectfully submits that Mizutani and Takeda et al. both fail to teach or suggest an imaging device, comprising a processor adapted to compile error information when an

error is detected, wherein the error is based on one or more imaging device processes; a print engine coupled to the processor and adapted to produce tangible output images; and a storage device coupled to the processor, wherein the processor is adapted to store in the storage device the error information for two or more errors for one or more of transmission, retrieval, and disposal of the error information based on user criteria; wherein the error information includes two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace. Applicant therefore respectfully submits that combining the elements of Mizutani with Takeda et al. fails to teach or suggest all elements of independent claims 1, 8 and 15 and thus also fails to teach or suggest all elements of dependent claims 2-3, 5-7, 9-10, 12-14, and 16-20, either alone or in combination.

Applicant's claim 1, as amended, recites "[a]n imaging device, comprising: a processor adapted to compile error information when an error is detected, wherein the error is based on one or more imaging device processes; a print engine coupled to the processor and adapted to produce tangible output images; and a storage device coupled to the processor, wherein the processor is adapted to store in the storage device the error information for two or more errors for one or more of transmission, retrieval, and disposal of the error information based on user criteria; wherein the error information includes two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace." As detailed above, Applicant submits that Mizutani and Takeda et al. fail to teach or suggest such an imaging device that is adapted to store in the storage device the error information for two or more errors, either alone or in combination. As such, Mizutani and Takeda et al. fail to teach or disclose all elements of independent claim 1.

Applicant's claim 8, as amended, recites "[a] method of error archiving for an imaging device, comprising monitoring system operations for the imaging device; and when an error is detected, compiling information about the error into an error file stored on a storage device of the imaging device for one or more of storage, transmission, retrieval, and disposal; wherein the

information about two or more errors is stored in the error file; and wherein the information about each error stored on the storage device includes two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace." As detailed above, Applicant submits that Mizutani and Takeda et al. fail to teach or suggest such a method of error archiving for an imaging device, either alone or in combination. As such, Mizutani and Takeda et al. fail to teach or disclose all elements of independent claim 8.

Applicant's claim 15, as amended, recites "[a] computer-usable medium having computer readable instructions stored thereon for execution by a processor to perform a method of error archiving for an imaging device comprising: monitoring system operations of the imaging device; and when an error is detected, compiling information about the error into an error file and storing it on a storage device for one or more of storage, transmission, retrieval, and disposal; wherein the information for two or more errors is stored in the error file; and wherein the information about each error stored on the storage device includes two or more of a location where the error occurred, a type of error detected, a program address where the error occurred, contents of the file being processed when the error occurred, sequence of events that led up to the error, type of file being processed when the error occurred, size of the file being processed when the error occurred, and a stack trace." As detailed above, Applicant submits that Mizutani and Takeda et al. fail to teach or suggest such a computer-usable medium and method, either alone or in combination. As such, Mizutani and Takeda et al. fail to teach or suggest all elements of independent claim 15.

Applicant respectfully contends that claims 1, 8 and 15 as pending have been shown to be patentably distinct from the cited reference. As claims 2-3, 5-7, 9-10, 12-14, and 16-20 depend from and further define claims 1, 8 and 15, respectively, they are also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claims 1-3, 5-10, and 12-20.

Claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Mizutani (U.S. Patent No. 6,078,400) in view of Takeda et al. (U.S. Patent No. 5,845,057) as applied to claim 1 above, and further in view of Venkatraman et al. (U.S. Patent No. 5,956,487). Applicant respectfully traverses this rejection and submits that claim 4 is allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Mizutani and Takeda et al. fail to teach or suggest, either alone or in combination all elements of claim 1, from which claim 4 depends from. As such, Applicant respectfully maintains that Mizutani and Takeda et al. also fail to teach or suggest all elements of claim 4. In addition, Applicant respectfully maintains that Venkatraman et al. discloses an embedded webserver system for networked devices allowing user interface functions to be accessed over a network. *See*, Venkatraman et al., Abstract and Summary. Applicant therefore respectfully submits that combining the elements of Mizutani and Takeda et al. with Venkatraman et al. fails to teach or suggest all elements of independent claim 1 and thus also fails to teach or suggest all elements of dependent claim 4, either alone or in combination.

Applicant respectfully contends that claim 1 as pending has been shown to be patentably distinct from the cited references, either alone or in combination. As claim 4 depends from and further defines claim 1 it is also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claim 4.

Claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Mizutani (U.S. Patent No. 6,078,400) in view of Takeda et al. (U.S. Patent No. 5,845,057) as applied to claim 8 above, and further in view of Ohtani (U.S. Patent No. 6,108,099). Applicant respectfully traverses this rejection and submits that claim 11 is allowable for the following reasons.

Applicant respectfully maintains, as stated above, that Mizutani and Takeda et al. fail to teach or suggest, either alone or in combination, all elements of claim 8, from which claim 11 depends from. As such, Applicant respectfully maintains that Mizutani and Takeda et al. also fail to teach or suggest all elements of claim 11. In addition, Applicant respectfully maintains that Ohtani discloses a networked image forming system having email communication of

abnormal conditions to users and administrators. *See*, Ohtani, Figures 4 and 6; Abstract and Summary. Applicant therefore respectfully submits that combining the elements of Mizutani and Takeda et al. with Ohtani fails to teach or suggest all elements of independent claim 8, and thus also fails to teach or suggest all elements of dependent claim 11, either alone or in combination.

Applicant respectfully contends that claim 8 as pending has been shown to be patentably distinct from the cited references, either alone or in combination. As claim 11 depends from and further defines claim 8 it is also considered to be in condition for allowance. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection under 35 U.S.C. § 103(a) and allowance of claim 11.

CONCLUSION

In view of the above remarks, Applicant believes that all pending claims are in condition for allowance and respectfully requests a Notice of Allowance be issued in this case. Please charge any further fees deemed necessary or credit any overpayment to Deposit Account No. 08-2025.

If the Examiner has any questions or concerns regarding this application, please contact the undersigned at (612) 312-2207.

Respectfully submitted,

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